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January 28, 2019

VIA ECF AND HAND DELIVERY

The Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10017

**Re: *Rosenberg v. Metropolis Group, Inc. et al.*, 18-cv-04830;
A&N Design Studio d/b/a Door3 Business Applications v. Rosenberg,
18-cv-11291
Parties' Joint Request for an Order Confirming Stipulated Deadlines**

Dear Judge Hellerstein:

Marshal Rosenberg (“Rosenberg”) and A&N Design Studio d/b/a Door3 Business Applications (“Door3”) jointly submit this letter requesting an order confirming the parties’ agreed-upon deadlines to answer or otherwise respond to the complaints filed in *Marshal Rosenberg v. Metropolis Group, Inc. et al.*, 18-cv-04830 and *A&N Design Studio d/b/a Door3 Business Applications v. Marshal Rosenberg*, 18-cv-11291.

I. *Rosenberg v. Metropolis Group, Inc. et al.*, 18-cv-04830

On January 25, 2019, Door3, through counsel, agreed to waive service of the summons issued in *Rosenberg v. Metropolis Group, Inc. et al.*, 18-cv-04830. Under Rule 4 of the Federal Rules of Civil Procedure, Door3’s deadline to answer or otherwise respond to Rosenberg’s amended complaint (the “FAC”) in that proceeding is or would be March 26, 2019.¹

By stipulation dated January 25, 2019, Rosenberg and Door3 agreed that Door3’s deadline to answer or otherwise respond to the FAC shall be February 14, 2019. The stipulation, together with Door3’s waiver of service and related documents, was filed via ECF on January 27, 2019. *See* ECF Docket No. 46.

¹ Defendant Metropolis Group, Inc. submitted its answer to the FAC on January 4, 2019. *See* ECF Docket No. 42.



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II. ***A&N Design Studio d/b/a Door3 Business Applications v. Marshal Rosenberg, 18-cv-11291***

On January 25, 2019, defendant Rosenberg, through counsel, agreed to waive service of the summons issued in *A&N Design Studio d/b/a Door3 Business Applications v. Marshal Rosenberg*, 18-cv-04830. Under Rule 4 of the Federal Rules of Civil Procedure, Rosenberg's deadline to answer or otherwise respond to the complaint in the above referenced proceeding (the "Complaint") is or would be March 26, 2019.

By stipulation dated January 25, 2019, the parties agreed that the deadline for Rosenberg to answer or otherwise respond to the Complaint shall be February 14, 2019. The stipulation, together with Rosenberg's waiver of service and related documents, was filed via ECF on January 27, 2019. *See* ECF Docket No. 10.

The mutually agreed-upon deadline of February 14, 2019 to answer or otherwise respond to the complaints filed in each of the actions referenced above will ensure that the Court is apprised of all parties' positions before the status conference currently scheduled for February 15, 2019 in *Marshal Rosenberg v. Metropolis Group, Inc. et al*, 18-cv-04830. Accordingly, the parties respectfully request that the Court issue an order adopting the February 14, 2019 deadline set forth in the parties' stipulations filed in *Marshal Rosenberg v. Metropolis Group, Inc. et al*, 18-cv-04830 and *A&N Design Studio d/b/a Door3 Business Applications v. Marshal Rosenberg*, 18-cv-11291.

Respectfully Submitted,

Date: New York, New York
January 28, 2019

/s/ Robert J. deBrauwere

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SO ORDERED:

Date: New York, New York
_____, 2019

Alvin K. Hellerstein
United States District Judge